



**22690 Pemberville Rd.
Luckey, OH 43443
419-837-5015**

Wireless Telecommunications Bureau
Federal Communications Commission
445 12th St., S.W.
Washington, D.C. 20554

WT Docket 18-353

Amplex is writing in support of the petition by the Wireless Internet Service Providers Association to extend the licenses and deadline for the transition of Part 90, subpart Z operations until January 8, 2023 for existing operators.

The rules adopted in 2015 included a 5-year transition from the existing licensing regime to CBRS operation with the intention of allowing a smooth transition for existing operators. Amplex currently operates a fixed wireless broadband system in NW Ohio serving over 8,000 customers in Wood, Ottawa, Lucas, Sandusky, Hancock, Erie, and Seneca counties. Currently 1,632 broadband customers receive service using the 3650-3700Mhz spectrum. These 1,600 customers represent approximately \$810,000 in investment consisting of \$450,000 in customer premise equipment, \$160,000 in tower site equipment, and (conservatively) \$200,000 in labor cost. This investment was made with the full expectation that this equipment would be able to transition to CBRS operation.

Due to the many and extensive delays outside of our control the ability of Amplex to transition to CBRS operation by the expiration of our existing license is unlikely. Amplex is prepared to begin commercial operation in CBRS. We have worked with our vendor to prepare, have applied with a SAS for Initial Commercial Operation and verified our existing installations to Professional Installation standards (or at least what we expect the standards will be – these programs are also not ready yet). We are ready to begin testing - yet it does not appear that this will be possible any time soon.

The many delays in CBRS leave Amplex in a difficult position. There is no guarantee that CBRS operation will be possible with our existing hardware. There is no guarantee that CBRS with its absolute reliance on a novel, extremely complex and unproven SAS system will provide a stable operational environment for critical broadband delivery. There is no current timeline for the FCC / DOD / Winforum to resolve the CBSD:CBSD startup issue. If CBRS or our existing equipment proves unsuitable for broadband delivery we will need to find a replacement solution for over 1600 customers in a very short timeframe.

If CBRS does not work switching customers to alternative frequencies (if it can even be done which is doubtful) and replacing all of the existing hardware will cost at least \$800,000. This represents the majority of our yearly capital budget as well as the labor of 2 full time installation crews along with a tower crew. Not only will this be disruptive to the existing customers the use of a full year of capital and labor represents an additional 1600 rural customers that will not be able to receive new service due to the resources being allocated to reworking existing customers.

We will not know until late 2019 at the earliest if CBRS will actually prove to be workable for Amplex and our customers, yet we need to start finding alternative solutions for those customers immediately if the deadline to be out of Part 90z stays at our current license expiration date of Jan 19, 2021. The remaining time between now and the expiration of our current license is not sufficient for an orderly transition. Waiting until mid 2019, which appears to be the earliest date that true testing of CBRS will be available, is far too late when there is an impending deadline 18 month later. The FCC needs to reset the clock now to both protect investment and to protect access for the many broadband consumers who rely on the existing rules for access.

Sincerely,

A handwritten signature in black ink that reads "Mark Radabaugh". The script is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Mark Radabaugh
President
Amplex Electric, Inc.